

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION)	MDL 2804
OPIATE LITIGATION)	
)	Case No. 1:17-md-2804-DAP
This document relates to:)	
)	Judge Dan Aaron Polster
<i>State of Alabama v. Purdue Pharma LP, et al.</i>)	
Case No. 1:18-OP-45236-DAP (N.D. Ohio))	

EXHIBIT A

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**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR LEAVE
TO FILE AMENDED COMPLAINT UNDER SEAL**

Plaintiff seeks leave to file its amended complaint under seal in *State of Alabama v. Purdue Pharma LP, et al.*, Case No. 18-OP-45236 (N.D. Ohio).

The Motion states that filing the amended complaint under seal is necessary to ensure compliance with the following Orders:

1. CMO One;
2. Protective Order Re: DEA's ARCOS/DADS Database, ECF Doc. 167 (hereinafter "ARCOS Protective Order"); and
3. Amended Agreed Confidentiality Order, filed in *City of Chicago v. Purdue Pharma L.P.*, Case No. 14-CV-04361, ECF Doc. 487 (N.D. Ill.) (hereinafter "City of Chicago Protective Order").

The Motion states that the amended complaint will contain information that is subject to the following Protective Orders:

1. Information designated CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER by the ARCOS Protective Order; and

2. Excerpts from documents produced in *The City of Chicago, Illinois v. Purdue Pharma L.P.*, Case No. 14-CV-04361 (N.D. Ill.), which are subject to the City of Chicago Protective Order, which binds Plaintiffs in MDL 2804 pursuant to CMO One.

Plaintiff's Motion for Leave to File an Amended Complaint Under Seal is hereby **GRANTED.**

IT IS SO ORDERED.

DAN AARON POLSTER
UNITED STATES DISTRICT JUDGE

Dated: _____